

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

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| IN THE MATTER OF THE SEARCH OF: | MJ 18-38-M-JCL |
| 1903 Townsend Avenue Helena, MT | Filed Under Seal |

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR SEARCH WARRANT**

I, Levi Kroschel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 2017. I am currently assigned to the FBI Helena Resident Agency (RA) in Helena, Montana, which is part of the Salt Lake City Division of the FBI. I am a member of the FBI Montana Regional Violent Crime Task Force (MRVCTF) which specializes in targeting habitual violent offenders and dismantling violent criminal enterprises and drug trafficking organizations. During my time as a Special Agent, I have participated in several complex investigations. Prior to my employment with the FBI, I served as a police officer in Colorado for five years and I

have been the affiant on numerous warrants for criminal violations in the state of Colorado.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. This affidavit is in support of a search warrant application for stored content from Facebook accounts regarding an ongoing conspiracy to distribute and traffic methamphetamine and heroin to Montana in violation of 21 U.S.C. § 846 and 21 U.S.C. § 841(a)(1).

PROPERTY TO BE SEARCHED

4. This affidavit is made in support of an application for a search warrant to search the following location: A two-story residence located at 1903 Townsend Avenue Helena, Montana 59601-3143, rented by Treblinka Dolan. This property contains a two story home and basement with beige siding and large green shrubs along the perimeter of the property. The residence does not have visible numbering indicating the address from the Townsend Avenue side or the alley way. The south entrance, accessed through the alley, is used as the main entrance for Dolan's residence. The

property also includes a smaller apartment located on the southwest corner of the main residence and a detached living space near the alley way. The apartment on the southwest corner of the main structure is not accessible from within Dolan's residence. A separate entrance to the apartment is located on the southwest corner of the main structure. The apartment on the southwest corner and the detached living space near the alley are not included in this warrant.

PROBABLE CAUSE

5. In May of 2017, the MRVCTF received information from James Allen Jr. that Greg Ryan, who lived at 1903 Townsend Avenue in Helena, Montana, was a heroin supplier. Allen Jr. admitted to having purchased several points of heroin from Ryan several days before the interview. One point is used to describe one-tenth of a gram. Ryan was involved in a relationship with Treblinka Dolan, who lived at the above listed address.

6. Following the information from Allen Jr., a trash cover was conducted at 1903 Townsend Avenue. The trash cover was facilitated through a confidential source who had access to the refuse. On June 1, 2017, the refuse was collected by a City of Helena trash vehicle and transported to 3001 Lyndale Avenue for inspection by Special Agents.

7. Inspection of the refuse yielded two capped syringes and a piece of mail addressed to 1903 Townsend Avenue. The barrel and plunger of one of the syringes was later swabbed and placed inside a Nik Narcotics Identification Systems pouch. The substance tested presumptive positive for amphetamine compounds.

8. On June 7, 2017, a state search warrant was executed at 1903 Townsend Avenue by members of the MRVCTF. Dolan and Ryan were located inside the residence. After the residence was secured, Dolan agreed to speak with Special Agent (SA) Monte Shaide and Task Force Officer Jared Cochran. Dolan was cooperative with interviewing agents and provided information on other suppliers and sellers in the area.

9. During the interview, Dolan said Ryan travelled back and forth from Olympia, Washington, every other week to pick up heroin. Dolan said Ryan brought back about one-half ounce, or 14 grams, from Washington per trip. Dolan said she and Ryan both needed the drug to survive. Dolan admitted to distributing heroin through Zach Weaseltail when she was supplied with heroin. Dolan was also cooperative in locating her personal use kit and unused needles inside the residence.

10. The search of the residence revealed multiple items of paraphernalia with residue. The items were collected and placed into evidence by TFO Hayes at the Lewis and Clark County Sheriff's Office.

11. In February 2018, Karen Martini was interviewed regarding Royden Johnson. At the time of the interview, Martini was staying with Johnson at his residence, located at 410 South Montana Avenue. Martini identified Johnson as a methamphetamine supplier in Helena. Martini said Larry Espinosa, Mike Martell, Roger Keech, John Haley, and Treblinka Dolan frequented Johnson's residence.

12. During the interview, Martini considered Dolan to be the main supplier of the group. Martini said Dolan travelled to Helena from Spokane, Washington, and delivered methamphetamine to Johnson at his residence. Martini believed Johnson also drove to Spokane to pick up methamphetamine from Dolan.

13. Martini also admitted to accompanying Johnson and Keech on a run to Spokane to meet Dolan. During the trip, Martini was given a rolled cigarette that she said tasted sweet and smelled nice. The next thing Martini remembered was seeing Dolan. Martini was able to identify Dolan from her picture on Facebook. Martini remained in the back seat of the car while Johnson, Keech, and Dolan spoke to each other outside.

14. During the trip, Martini stayed in a hotel with Johnson, who was smoking methamphetamine. The following day, Johnson and Martini left the hotel around 11 AM. Johnson told Martini that Dolan and Keech had already left in Keech's car. Johnson also told Martini there was two pounds of methamphetamine inside the car he was driving.

15. Martini and Johnson eventually returned to Johnson's residence. While there, Martini said she was confronted by Keech and Dolan. Martini also said Dolan was often at Johnson's house for meetings that lasted three to four hours. Martini was not allowed to be part of the meetings that occurred.

16. Martini was asked to describe the hierarchy of the drug trafficking organization. Martini said everyone involved answered to Dolan. Martini said Johnson and Keech were just below Dolan. Those below Johnson and Keech included Will Lesh and Corrin Lesh.

17. Following the interview with Martini, Larry Espinosa was interviewed at the Lewis and Clark County Jail. During the interview, Espinosa admitted to providing money to Nick Spalding and Jason Smart as an investment in a drug deal. In a later interview with Espinosa, he referenced Dolan's involvement in trafficking drugs. Espinosa said Dolan was dying and said she was the one who connected everyone together.

Espinosa said Dolan was the one who set everything up and all involved individuals were based on Dolan's connections. Espinosa said Dolan lived in Helena and described her residence as having shrubs around it.

18. On February 27, 2018, a federal search warrant was executed on 410 South Montana Avenue. Royden Johnson and Maya Bannon were contacted inside the residence at the time of the warrant service and were detained by agents. Both Johnson and Bannon were interviewed following the warrant execution.

19. Johnson was interviewed by SA Bowen and TFO Hayes following the search warrant at his residence. Johnson was advised of his rights prior to the interview and agreed to speak with the interviewing agents. Johnson confirmed that he did make a trip to Washington with Martini and Keech. Johnson said they drove to a hotel and met with Dolan. After the meeting, Johnson drove Dolan's car back to Montana. Johnson said there were no drugs in Dolan's car on the return trip to Montana. Johnson believed Keech received a couple of ounces of methamphetamine from Dolan during this trip. Johnson also said Dolan provided him and Martini with one-quarter ounce of methamphetamine at the hotel.

20. TFO Cochran and SA Nick Seedall interviewed Bannon after she was removed from the residence and placed in an unmarked police

vehicle. TFO Cochran advised Bannon of her rights, and Bannon agreed to speak with TFO Cochran and SA Nick Seedall.

21. Bannon admitted to being a heavy intravenous methamphetamine user and said she used up to two grams per day. Bannon stayed in the upstairs bedroom of the residence and admitted there was methamphetamine that was hers under the bed. Bannon had stayed in the residence for approximately four days before the search.

22. Bannon was aware Johnson was a methamphetamine supplier and that he had recently had a falling out with his co-conspirators in the Helena area. Bannon said John Haley, Tricia Werner, a male named Nick, Larry Espinosa, Roger Keech, Roy Shostack, and Treblinka Dolan were involved with Johnson.

23. Bannon said she recently had been getting her methamphetamine from Dolan. Bannon said Dolan drove a blue car with the driver's window broken out. Bannon said Dolan lived on the corner of Hannaford Street and Townsend Avenue in Helena. Bannon had first met Dolan through Keech when Bannon was released from jail around February 7, 2018.

24. Following the execution of the search warrant at the residence, a state search warrant was issued for Johnson's cell phone. The data

extraction revealed Facebook messages were exchanged between Johnson and Dolan.

25. In a series of follow-up interviews with Bannon in April 2018, Bannon provided additional information on Dolan's involvement in trafficking drugs with Johnson and Keech. According to Bannon, Dolan returned from a run with Haley, Werner, and a male named Steve after Bannon was released from jail. Bannon remembered Dolan gave Keech several ounces of methamphetamine after the trip. Bannon believed Dolan received her methamphetamine from Nick Spalding.

26. Several weeks prior to the interview and following the search at Johnson's residence, Bannon said she accompanied Dolan on a trip to Washington. While in Washington, Bannon met Dolan's boyfriend, Greg Ryan, who is known to law enforcement as involved in using and distributing heroin. During this trip, Bannon believed Ryan and Dolan wanted Bannon to sell drugs for them and act as the runner between Washington and Montana.

27. Bannon separated the drug suppliers in Helena into two groups. The first consisted of Johnson, Keech, Joanna Barnes, and herself. The second group consisted of Haley, Espinosa, and Werner. Bannon described the common denominator of the two groups as Dolan. In a later interview

with Bannon, she explained that Dolan had introduced Haley, Keech, and other known drug dealers in the Helena area.

28. Bannon said Keech and Dolan had also been in a dispute regarding drugs. Bannon explained Keech thought Dolan took drugs from him. The dispute between Keech and Dolan caused Keech to seek out Spalding as his supplier. Bannon also said Dolan later took 11 grams of methamphetamine from Spalding without paying for it.

29. Bannon said she periodically stayed with Dolan at her residence following the search warrant at Johnson's residence. While at Dolan's residence, Dolan gave Bannon her first shot of heroin. Bannon said the heroin made her sick and that she slept for 15 hours after using it. Bannon estimated Dolan had almost three grams of heroin when Dolan gave her the shot.

30. Bannon revealed Dolan also received shipments of heroin through the mail at her residence at 1903 Townsend Avenue. Bannon said three packages were supposed to come to Dolan, but only two were received by Dolan. Bannon saw three baggies of heroin that Dolan had received in one of her packages through the mail. Bannon estimated three of the baggies were equivalent to an eight ball size of methamphetamine.

31. Following the information that was provided regarding Dolan's shipments of heroin through the U.S. Postal Service, a postal watch was placed on the residence on May 1, 2018. As of this writing, no packages of heroin have been located in transit to Dolan's residence.

32. On May 9, 2018, at approximately 1:39 PM, Bannon contacted SA Levi Kroschel and SA Jason Bowen by telephone. Earlier in the same day, Bannon attempted to contact Dolan through Facebook and by phone but was unsuccessful. When Bannon was not able to contact Dolan through Facebook or phone, Bannon decided to go to Dolan's residence at 1903 Townsend Avenue. Bannon estimated she arrived at Dolan's residence at approximately 12:45 PM on May 9, 2018. Bannon said Dolan was excited to see her and invited her inside the residence. Bannon observed Dolan complete a drug transaction and said Dolan had approximately two grams of dark, or heroin. Bannon said she left Dolan's residence and returned to her residence where Dolan was waiting to pick her back up. Bannon was not tasked with returning to Dolan's residence. Bannon decided to return to Dolan's residence with Dolan because not returning would have been out of character and suspicious to Dolan.

33. At approximately 2 PM on May 9, 2018, with Bannon at Dolan's residence, SA Kroschel and SA Bowen conducted surveillance in

the area of Dolan's residence. Parked in the alley behind the residence was a small blue sedan with clear plastic covering the driver side window. A small silver car with a rear spoiler and a small black truck were also seen parked in the alley behind the residence. The small black truck left shortly after surveillance began.

34. As surveillance continued, still on May 9, 2018, a sedan pulled into the alley behind the residence and a male and female were seen outside the vehicle. The male walked toward the house and out of view before he returned to the silver vehicle. The male entered the silver vehicle and drove away.

35. Shortly after, the small blue car with plastic over the driver window left the residence and travelled south on Hannaford Street and turned left on Boulder Street. Surveillance continued until the vehicle pulled into a gas station located near the intersection of Cedar Street and Oakes Street. When the passenger opened the door, Bannon was seen exiting the vehicle.

36. Following the surveillance, Bannon was interviewed at the Helena RA by SA Kroschel and TFO Hayes at approximately 4:40 PM on May 9, 2018. Bannon provided a more detailed account of her interaction with Dolan on May 9, 2018. Bannon said she first went to Dolan's residence

around 12:45 PM after she could not contact Dolan through Facebook or the phone. After Dolan invited Bannon inside, Bannon saw Dolan complete two separate drug transactions. One of the transactions involved a male who was unknown to Bannon and the other involved a male named Callin (Last Name Unknown).

37. Bannon said Dolan told her the unknown male received two grams of heroin from Dolan. Bannon said the unknown male was involved with heroin in the Helena area and was known to associate with Joanna Barnes. Bannon also saw Callin trade one bag of clear, or methamphetamine, for one point of dark from Dolan. Bannon also saw Dolan and the others in the residence do shots of heroin. Dolan told Bannon the heroin was good and also said she had a can of Narcan. After the drug transactions, Bannon returned to her house and Dolan came to pick her up.

38. After Dolan and Bannon returned to Dolan's residence, Bannon said Trenton Hiler, Gerald Hiler, and Gerald's daughter also arrived at the residence. Trenton then left in his silver car. Bannon estimated there were nearly 500 used needles inside Dolan's residence and that Dolan kept her used needles in a box. Bannon suspected Dolan had enough heroin for her to sell and for personal use to prevent getting sick.

39. Dolan told Bannon she was able to stay high while she was in Washington and that she had missed a vein in her groin when she was trying to shoot up. Dolan told Bannon she now “muscled” the heroin, which meant she injected it into her muscle instead of into a vein. Dolan also told Bannon she did not think she could ever stop using heroin.

40. Bannon said Dolan kept her drugs in a brown Gucci bag that was kept in her purse, with her, or in her closet. Dolan provided Bannon with her telephone number of (360) 789-2722. Dolan eventually dropped off Bannon at a gas station near the intersection of Cedar Street and Oakes Street.

41. On May 10, and again on May 24, 2018, trash covers were conducted at 1903 Townsend Avenue in Helena. The trash covers were facilitated through a source who has been known to provide reliable information and had access to the refuse. On May 10, a syringe and a State of Montana Department of Health and Human Services SNAP application addressed to Dolan at 1903 Townsend Avenue were located in a single bag. The syringe was later field tested for the presence of methamphetamine. The test indicated a field presumptive positive, indicating the presence of methamphetamine.

42. During the second trash cover, the following items were located and collected: multiple hypodermic syringes, multiple plastic bindles containing an off white substance, one plastic bag containing white residue, and two pieces of mail addressed to Treblinka Dolan at 1903 Townsend Avenue.

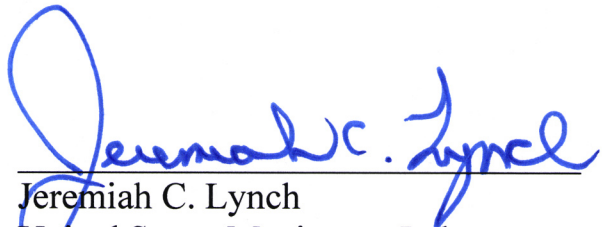
AUTHORIZATION REQUEST

43. Based on the foregoing, I submit there is probable cause to search the premises referenced above in paragraph 4 and below in Attachment A, for the items referenced in Attachment B. The evidence I have reviewed indicates Treblinka Dolan is involved in trafficking large amounts of methamphetamine and heroin in the Helena area.

Respectfully submitted,

Levi Kroschel
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on June ²⁰~~21~~, 2018



Jeremiah C. Lynch
United States Magistrate Judge
Missoula, Montana